

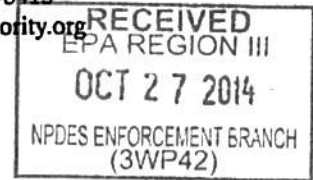


LEHIGH COUNTY AUTHORITY

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October 22, 2014

Rebecca Crane
Enforcement Officer
NPDES Enforcement Branch (3WP42)
United States Environmental Protection Agency Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Public Outreach and Communications Plan related to USEPA Administrative Order CWA-03-2009-0313DN

Dear Ms. Crane:

As discussed at our September 10, 2014 meeting, the signatories to the USEPA Findings of Violation, Order for Compliance, and Request for Information, Docket No. CWA-03-2009-0313DN ("Administrative Order"), are implementing public outreach and education regarding the issues associated with the Administrative Order. Our goal is to increase public awareness of both the work that has been completed to date and the work that remains to be completed in order to comply with the Administrative Order.

In addition to customer mailings and website postings, the Lehigh County Authority will be leading a public meeting to be held on November 13, 2014 at 6:30 pm at the Lehigh County Government Center, 17 S 7th St., Allentown, PA 18101. The City of Allentown will be participating in the public meeting and we expect other City Signatories to be part of the public meeting. A description of the public meeting is included in the Lehigh County Authority's draft Communications Plan attached to this letter.

Representatives of the USEPA are invited to attend the public meeting.

Please contact Pat Mandes at (610) 398-2503 with any questions.

Sincerely,

Aurel Arndt

Chief Executive Officer
Lehigh County Authority

Edward Pawlowski

Mayor
City of Allentown

Every drop matters. Every customer counts.

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Lehigh County Authority

US EPA Administrative Order – Communications Plan

Fall 2014

Communications Planning

The focus of this communication plan is to increase public awareness of the significant work completed to date on this important project, and to generate public support for a deadline extension. Ultimately, USEPA needs to decide on the deadline extension, and their decision will be made easier if the public supports it.

Key Considerations:

Timing – LCA and the other AO parties must submit an action plan along with an official extension request to USEPA by November 15, 2014. Ideally, some portion of the communications strategy should be implemented in advance of this date.

Participation by AO Parties – It would be most effective for the City of Allentown officials to partner with LCA on the communications strategies, to reflect a systemwide commitment to the work that must be completed. Other municipal signatories should also be encouraged to participate in the communications strategies.

Environmental/No-Growth Advocates – It is unlikely that any communications strategy will be effective in changing the attitudes and perceptions of certain individuals in the community who strongly oppose LCA as an organization, regardless of positive progress. Therefore, communications strategies should be focused on appealing to those who are willing to listen and to partner with LCA toward a solution to this regional problem.

Future Outreach Planning:

In the months and years ahead, as the municipalities continue to work on AO-related projects, public outreach will continue in the form of additional meetings, customer mailings, website postings and media outreach. The focus of this future outreach would be to illustrate continued commitment to the work, seek input as needed, and share information with ratepayers as it becomes available about actual costs and rate impacts.

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Target Audiences / Stakeholders

Municipal Signatories – Will need some guidance and coordination on conducting public outreach activities.

Environmental/No-Growth Advocates – Will likely participate in public meetings / discussions on the AO work, but unlikely to be convinced that LCA is doing its part to solve the problem.

“Regional” Organizations/Leaders – These organizations likely have an interest in the AO work from the standpoint of promoting issues of quality-of-life, environmental sustainability, economic development and land-use planning issues in the Lehigh Valley. They also have target audiences that may share such interests and could be helpful in disseminating information on this topic to their constituents. Specific organizations / individuals include:

- RenewLV
- Economic Development Corp or LV
- Community Action Committee of LV
- League of Women Voters
- Local Legislators
- LV Chamber of Commerce & Other Regional Chambers
- LV Planning Commission
- Local/Municipal Planning Boards
- Local Environmental Advisory Councils
- LV Watershed Coalition

Homebuilders / Developers – The AO is a major concern for local developers who may face a moratorium on new construction if I&I is not sufficiently reduced. Communication strategies should focus on sharing information on the progress made so far, and building developers’ support for a USEPA deadline extension, vs. more onerous consequences.

Lease “Watchdogs” – Some citizens groups, and city officials, are watching LCA closely to evaluate the success / failure of the lease of the Allentown water / sewer systems. Messages should remain neutral on lease issues and provide positive evidence that Allentown and LCA are strong partners in addressing this issue. Cost recovery methods outlined in the lease will not be a highlight of this outreach program, but can be discussed by knowledgeable speakers if questions are presented at public meetings.

Customers – Generally speaking, customers are likely not highly aware of the issues involved with the AO. They may have some localized experiences about sewer backups or overflows in the Parkway, etc., but may not understand the complexity of the service arrangement in Lehigh County or the variety of partners involved with developing solutions to the problem. Communication strategies should focus on building basic awareness of the issue.

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Key Messages

The messages described below provide a conceptual outline of the material we wish to present through this communications plan. As materials are developed (e.g. press releases, presentations, etc.), they will be evaluated to ensure they focus on these key messages.

We (LCA and other AO parties) are committed to the shared goal of eliminating SSOs.

We have made meaningful progress so far in building partnerships with municipalities that share the system, understanding the problem and investing in solutions.

We will continue to invest significant resources toward the goal of eliminating SSOs in our system.

Reducing infiltration and inflow is not a five-year project. It is a long-term project that requires long-range vision, investment, community partnership and commitment.

Partners in this effort must seek ways to balance environmental impacts of SSOs with the significant cost associated with eliminating them, and the resulting impact on ratepayers.

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Strategies

Message Development – Workshop with key participants (LCA, Allentown, others?) to review key messages, including detailed review of slides, graphics, statistics, etc. that are available to support the key messages.

AO Partners Meeting – Review communications plan with municipal signatories and determine roles each partner will serve in implementing/supporting the plan.

Media Relations – Before and after any public meetings, offer media interviews and press releases to share detailed information with reporters. LCA and City collaboration on press releases is desirable.

Website – Post more detailed information than can be published via media, notice of public meetings, customer mailings, etc. Offer all past progress reports, capital planning documents, etc. that support key messages.

Customer Mailing – An LCA customerwide newsletter was originally planned for October 2014, and space can be reserved for key messages about the AO progress. A small format (half-sheet postcard) can be developed with the same information, with a supply provided to municipalities where customers are not billed directly by LCA (Macungie, Alburtis, Emmaus, others).

Public Meeting – One large-format meeting, open to the public, following this basic agenda:

Presentation (30 - 45 minutes)

- Opening Remarks & Municipal Collaboration – Allentown Representative
- Review of Admin Order – Aurel Arndt, LCA CEO
- Progress Report – Technical Advisors (Arcadis, others?)
- Closing Comments / Next Steps / Extension Request – Allentown Representative
- Questions (collected on postcards throughout meeting) – facilitated by Aurel Arndt

Demonstration Stations (4 “stations” around the meeting room, allowing for “mingle” time)

- CCTV & smoke testing video examples (using City’s video kiosk?)
- Manhole inserts / other “hardware” examples
- GIS map w/ flow modeling results
- Homeowner responsibilities (include rain barrel display from Coca-Cola?)

Feedback Kiosk

- Place to sign-in & register additional questions
- Collect email and mailing addresses

Meeting FAQs – From postcards and other feedback collected at the meeting, an FAQ document will be compiled for distribution to participants, and posting online.

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Presentation “Road Show” – Marketed as an “in case you missed it” session, LCA will offer to attend organizational meetings around the Valley to share a short-version of the presentation and answer questions. Depending on the organization, we can coordinate with other AO partners to attend as appropriate. Target organizations would include those listed in the Target Audiences section above.

Schedule & Initial Responsibilities

Strategy	Schedule
Message Development w/ City of Allentown	Week of 9/22/14
AO Partners Meeting / Outreach	Week of 9/29/14
Media Relations	Ongoing
Website	10/6/14
Customer Mailing	10/27/14
LCA Board Meeting	10/27/14 or 11/10/14
Public Meeting	11/13/14 Start Time: 6:30 p.m. Location: County Govt. Center
Presentation “Road Show”	10/15/14 – 12/10/14

Western Lehigh Sewerage Partnership/City of Allentown			
	Action	Anticipated/ Actual Start	Anticipated/ Actual Finish
Phase 1	1 537 Plan new flows for 2020, 2030, and 2040 planning horizons for all signatories.	November 2012	March 2014
	2 Preliminary screening of alternatives for WLSP and considering flow issues only to Kecks Bridge to shorten the overall schedule. [COA Phase 1 Corrective Action Report]	Spring 2013	May 2014
	3 Combining of WLSP and COA models into combined KISS model	May 2014	June 2014
	4 Running initial 537 Plan alternatives	June 2014	July 2014
	5 Collect rainfall and flow data between Kecks Bridge and KIWWTP to better calibrate KISS model in this zone.	June 2014	September 2014
	6 Trim the KISS model to run more effectively	October 2014	November 2014
	7 Recalibrate KISS model between Kecks Bridge and KIWWTP	October 2014	December 2014
	8 Conduct peaking factor evaluation of all metered connections	January 2015	February 2015
	9 3 engineering teams select initial alternatives to model	October 2014	December 2014
	10 Final screening of wet and dry weather alternatives using KISS model to seek coordinated, holistic, economical solutions through to KIWWTP blending and not blending including options for 537 Plan, AO, and SCARP. [COA Phase 2 Corrective Action Report draft]	January 2015	November 2015
	10a Run first round of alternatives. Select second round of alternatives to run.	January 2015	May 2015
	10b Run second round of alternatives	June 2015	November 2015
	10c Discussions with each municipality on likely issues, costs, and timetables.	March 2015	November 2015
	11 Recommend 3 potential courses of action to WLSP partners and COA Signatories for initial consideration and feedback, including total 2040 CIP cost	December 2015	January 2016
	12 Develop 2017-2040 phased costing for 3 recommended alternatives.	February 2016	March 2016
	12a Decision on Blending*	March 2016	
	13 Select draft combined approach	April 2016	June 2016
	13a Discussions with each municipality on likely issues, costs, affordability, and timetables.	March 2016	June 2016
	14 Develop SCARP CIP budget and 2017-2040 cash flow demand for each signatory on draft combined approach	July 2016	August 2016
Phase 2	15 Conduct individual WLSP partner financial reality checks, prepare themselves financially, and negotiate and adopt a mutually agreeable Memorandum of Understanding (MOU) between them governing SCARP implementation.	September 2016	September 2017
	16 COA to conduct discussions with COA signatories regarding scope and costs for selected alternative as it impacts their service areas directly or impacts them as cost-sharing for improvements to COA infrastructure.	September 2016	September 2017
	17 Negotiate MOU with COA for COA-LCA joint projects for each aspect of SCARP/AO CIP implementation	September 2016	September 2017
	18 Negotiate MOU with COA for COA-signatory joint projects for each aspect of SCARP/AO CIP implementation	September 2016	September 2017
	19 Submit SCARP/AO CIP plan (schedule, budget, cash flow) to USEPA - End of Phase 1	October 31, 2017	October 31, 2017
	20 Phase 2 - Procurement, Design, and Construction of AO/SCARP CIP projects [Multiple Phases possible - to be determined as CIP is prepared]	January 2018	**
	A High priority I&I source removal activities that are expected to be included in any final alternative will continue to be conducted on an independent path to accelerate achievement of current capacity issue elimination.	Ongoing	Ongoing

Notes:

* - If resolution of blending is delayed, the schedule of remaining activities is extended until resolution.

** - Schedule for implementation of the CIP to be submitted with CIP.

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